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July 24, 2020

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) concerning a sealed filing made by Saudi Arabia today opposing Plaintiffs’ Rule 72 objections to this Court’s Opinion & Order dated June 23, 2020, ECF No. 6290 (filed under seal).

Today’s filing contains information subject to the general MDL protective order, ECF No. 1900. The filing discusses documents that are inviolable under the Vienna Convention on Diplomatic Relations and the Vienna Convention on Consular Relations, which are properly sealed under this Court’s order of July 22, 2019, ECF No. 4696, at 8-10. Today’s filing also contains information subject to the Privacy Act Order and Protective Order for FBI Documents, ECF No. 4255.

Consistent with this Court’s guidance, ECF Nos. 5307, 6084, Saudi Arabia is making today’s filing under seal using the Court’s sealed ECF procedures. Saudi Arabia is also submitting its proposed redactions for FBI protected information to the FBI for review. Because the proposed redactions have not yet been reviewed by the FBI, Saudi Arabia is not filing a redacted version on the public docket at this time.

Copies of Saudi Arabia’s filing (clean and with highlighted proposed redactions) are being sent today by email to Your Honor’s chambers and to counsel for Plaintiffs, the United States, and Dallah Avco. No courtesy copies of either this letter or today’s sealed filing are being sent to the chambers of Judge Daniels, as instructed by the temporary revisions to his Individual Practices in light of the ongoing public health crisis.

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Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)